

GREGORY ANTOLLINO

A T T O R N E Y A T L A W

GREG@ANTOLLINO.COM

275 SEVENTH AVENUE, SUITE 705
NEW YORK, NEW YORK 10001

TEL. (212) 334-7397
FAX (212) 334-7399

August 1, 2018

Judge Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Leznik v. Lincoln Financial, 18-3656 (PAC)

Dear Judge Crotty:

I represent plaintiff in this action and write to supplement the joint letter that the parties recently filed. In supplementing plaintiff's contentions, the New York City Human Rights Law credit-discrimination laws – only recently adopted – contain a defense to “executives” or higher-up decision makers. But in this case, the defense contends that plaintiff was a mere contractor. We say he was an employee, but either way, said defense would seem inapplicable.

Insofar as bankruptcy discrimination is concerned, plaintiff's bankruptcy was disclosed to the firm at the time of his hiring, this if the defense did not apply then why would it now.

Sincerely,

Greg S. Antollino

Gregory Antollino
Antollino PLLC

Cc: Diane Windholz